

# **Exhibit 13**

CLEARY GOTTLIEB STEEN & HAMILTON LLP

NEW YORK	2 London Wall Place	ROME
WASHINGTON, D.C.	London EC2Y 5AU	MILAN
PARIS	T: +44 20 7614 2200	HONG KONG
BRUSSELS	F: +44 20 7600 1698	BEIJING
FRANKFURT	clearygottlieb.com	BUENOS AIRES
COLOGNE	D: +44 20 7614 2364	SÃO PAULO
MOSCOW	jbrady@cgsh.com	ABU DHABI
		SEOUL

Our ref: JK/JB/NT/28205-202

15 January 2020

Asserson Law Offices  
38 Wigmore Street  
London W1U 2RU

**By hand**  
**Copy by email**

Dear Sir or Madam,

**Vale S.A. and others v (1) Benjamin Steinmetz, (2) Dag Lars Cramer, (3) Marcus Struik, (4) Asher Avidan, (5) Joseph Tchelet, (6) David Clark, (7) Balda Foundation and (8) NYSCO Management Corporation (Claim No. CL-2019-000723)**

Please find enclosed by way of service our clients' Particulars of Claim dated 15 January 2020, as filed with the Court by CE-File earlier today.

We also enclose our clients' Initial Disclosure List of Documents which has also been filed with the Court by CE-File today. In accordance with paragraph 5.4(3)(a) and (b) of Practice Direction 51U, copies of the documents referred to in the Initial Disclosure List of Documents have not been reproduced since these have already been provided to your client.

In addition, we confirm that steps have been taken to preserve relevant documents in accordance with the duties under paragraphs 3.1(1) and 3.2(1), and as required by paragraphs 4.1 to 4.4 of Practice Direction 51U.

Yours faithfully,

*Cleary Gottlieb Steen & Hamilton LLP*

Cleary Gottlieb Steen & Hamilton LLP

Encs.